

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

RECEIVED

SEP 06 2017 *EW*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

(Enter above the full name of the plaintiff
or plaintiffs in this action)

Carleous Darrell Clay

vs.

*Leutenant Williams, Counselor A.
Henderson, Correctional Officer
Beussette, and others -*

1:17-cv-06461

Judge Manish S. Shah

Magistrate Judge Sheila M. Finnegan
PC 9

(Enter above the full name of ALL defendants
in this action. Do not use "et. al.")

CHECK ONE ONLY:

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COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION
1983 U.S. Code (state, county, or municipal defendants)

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COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION),
TITLE 28 SECTION 1331 U.S. Code (federal defendants)

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OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS
FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

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I. Plaintiff(s):

- A. Name: Carleous Darrell Clay
- B. List all aliases: Carlos Clay
- C. Prisoner identification number: 18864-040
- D. Place of present confinement: Livingston County Jail
- E. Address: 644 W. Lincoln, Pontiac, IL 71764

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant (s):

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: (first name unknown) Williams
Title: Leutenant
Place of Employment: Metropolitan Correction Center, Chicago
- B. Defendant: A. Henderson (first name unknown)
Title: Counselor
Place of Employment: Metropolitan Correction Center, Chicago
- C. Defendant: (first name unknown) Beussotte
Title: Correctional officer
Place of Employment: Metropolitan Correctional Center, Chicago

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

II. Defendant(s).

A. Defendant (need copy of surveillance video and incident report from MCC to name others).

B. Title: Correctional Officers, and others

Place of Employment: Metropolitan Correctional Center

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III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

A. Name of case and docket number:

N/A

B. Approximate date of filing lawsuit:

C. List all plaintiffs (if you had co-plaintiffs), including any aliases:

D. List all defendants:

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county):

F. Name of the judge to whom the case was assigned:

G. Basic claim made:

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?):

I. Approximate date of disposition:

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

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IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On or about April 8, 2017 I, Carlos Clay was involved in an incident that involved a hostage. A counselor was apprehended and held in a office with a knife.

In response to this incident, a massive army of correctional officers, Lieutenants, and other Employees of Chicago (MCC) responded by getting to the scene as soon as they could.

Pepper spray was sprayed into the office before they burst their way in. Additional pepper spray was sprayed directly into my eyes and towards my face. The officers approached me as I dropped the knife and put my hands up in surrender.

They began beating me up physically, punching and kicking me. I was put into handcuffs with my hands behind my back. Lieutenant Williams, Officer Beussate and others continued to use force that was unnecessary and continued to kick ~~with~~ me with their boots and punch me with their hands. My face was rammed into the floor and desk.

Then I was dragged from the office, "face first" down two sets of steps where my face hit the stairs on numerous occasions. I was dropped onto my face once we arrived at the elevator. The officers continued to beat me until the elevator doors opened. I was then thrown inside elevator and beat again from the thirteenth floor all the way until we reached the seventh floor.

As a result of this, my face was bruised up badly (see photos after incident), I had bruises over my head, my shoulder was injured for weeks after, I couldn't walk on one leg for weeks, and I had to undergo a psychological evaluation. Mentally I was

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affected from the beating, I was put on medication from two different Psychiatrist. One diagnosed me as suffering from extreme depression, Anxiety, and schizophrenic. The other one sided with the first but also put me on some kind of modifier dealing with impulse.

The incident almost killed me. It drove me to attempting to commit suicide. I am still suffering today from all of this.

(There is surveillance to the incident that MCC has).

Also, my personal property was damaged and then destroyed by these same officers including legal discovery disk that has prevented me from preparing for trial in my defense. I lost my MP3 player, shoes, radio, sweat suit (top & bottom), commissary and other valuable things.

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V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want the court to hear this claim, for it to be heard by a Judge, and for the courts to order MCC to turn over the surveillance video, incident report and names of everyone involved in this case to me so that I can continue filing my complaint.

VI. The plaintiff demands that the case be tried by a jury.

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YES

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NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 29 day of Aug, 2017

Carleous Clay
(Signature of plaintiff or plaintiffs)

(Print name) Carleous Darrell Clay

(I.D. Number) 18864-040

(Address) Livingston County Jail
844 W. Lincoln
Portiac, IL 71764

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I don't know some of the officers full names in this case but there is (was) a video of the incident, as well as an incident report that Metropolitan Correction Center has that can provide this information. I put down what I know.